



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ANDREW M. CUOMO
Attorney General

(212) 416-8632

July 1, 2008

LESLIE G. LEACH
Executive Deputy Attorney General
Division of State Counsel

JUNE DUFFY
Assistant Attorney General in Charge
Litigation Bureau

BY HAND

Honorable Lisa Margaret Smith
United States Magistrate Judge
Southern District of New York
United States Courthouse
300 Quarropas St., Room 428
White Plains, NY 10601

Re: Wasseff v. Health Research Inc.
08 CV 00289 (CLB)(LMS)

Dear Magistrate Judge ~~Reyes~~ *Smith*

I am an Assistant Attorney General in the New York State Attorney General's Office, and have been recently assigned to represent defendant Helen Hayes Hospital in the above-referenced action.

I write to respectfully request that defendant Helen Hayes Hospital's time to respond to the complaint be extended from July 7 to July 16, 2008. The extension is needed for defendant adequately investigate the facts, research the law and draft responsive papers, and have the same reviewed by my client contact (who will be on vacation for the July 4th holiday). This extension will not unduly prejudice the progress of this case, as July 16 is our co-defendant's, Health Research Inc., deadline to respond.

Today, I spoke with plaintiff to request his consent. He refused to consent stating "since Helen Hayes Hospital acted towards me as if they are so perfect, why do they need extra time?" This is defendants' first request for an extension.

Respectfully submitted,

George A. Alvarez
Assistant Attorney General

cc: Sameh Kamel Wasseff
Heather Diddel, Esq.